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May 22, 2020

TO: Hon. Kenneth M. Karas
United States District Court
United States Courthouse
300 Quarropas Street, Chambers 533
White Plains, NY 10601-4150

MEMO ENDORSED

RE: *United States v. Anupam Biswas, 7:18 Cr. 604 (KMK)*

Dear Judge Karas,

This letter is submitted on behalf of defendant Anupam Biswas to respectfully request that the above-captioned case, currently scheduled for June 11, 2020, be adjourned without the appearance of counsel.

Mr. Biswas entered into a plea of guilty to 18 U.S.C. §§ 2252(a)(2)(B) on June 27, 2019. The matter is currently scheduled for sentencing on June 11, 2020. Defense is now requesting an adjournment of sentencing. In our prior request, the defense indicated that due to the present crisis, our office had been unable to get a final updated report from Mr. Biswas' present psychologist in order to complete our sentencing memorandum. We are still awaiting a final report to best reflect Mr. Biswas' continued participation in the program throughout this pandemic.

Further, AUSA Marcia Cohen and I are presently engaging in efforts to resolve any restitution issues in order to have an agreed upon number at the time of sentencing. This process will require reaching out to various attorneys to discuss said restitution prior to the sentencing date.

Additionally, Mr. Biswas suffers from a number of health issues which are of increased concern now due to the global pandemic. Consequently, we are hesitant to go forward with sentencing at this time as immediate incarceration would potentially put his health at risk. Furthermore, as present appearances are being held virtually, defense is requesting an adjournment so that Mr. Biswas can be sentenced in person, with all parties present in court.

In terms of scheduling, AUSA Cohen and myself have discussed an adjournment of at least 60 days, given the current state of affairs regarding COVID-19 and the unknowns as to when courts will resume normal functioning. This request, which asks for an adjournment from the June 11th date without the appearance of counsel, is the third request since defendant pled guilty. Defense previously asked for an adjournment from the February 4th date, which the Court granted. If the Court has any questions or concerns, please contact my office. Thank you for your attention in this matter.

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/s/ Julie Rendelman
Julie Rendelman,
Attorney for Defendant Anupam Biswas

cc: Marcia S. Cohen, Assistant U.S. Attorney (email)

Granted. The Court will
go forward with sentence
on September 9, 2020
at 10:00 AM

SO ORDERED


KENNETH M. KARAS U.S.D.J.

5/23/2020